

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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AURELIUS CAPITAL MASTER,
LTD.,

Plaintiff,

v.

THE REPUBLIC OF ARGENTINA,

Defendant.

Case No.: 1:19-CV-0351 (LAP)

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NOVORIVER S.A.,

Plaintiff,

v.

ARGENTINE REPUBLIC,

Defendant.

Case No.: 1:19-CV-09786 (LAP)

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[CAPTION CONTINUED ON FOLLOWING PAGES]

**PLAINTIFFS' JOINT NOTICE OF CROSS-
MOTION FOR SUMMARY JUDGMENT**

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ACP MASTER, LTD.,	:
	:
Plaintiff,	:
	:
v.	:
	:
THE REPUBLIC OF ARGENTINA,	:
	:
Defendant.	:
-----X	
683 CAPITAL PARTNERS, LP,	:
	:
Plaintiff,	:
	:
v.	:
	:
THE REPUBLIC OF ARGENTINA,	:
	:
Defendant.	:
-----X	
ADONA LLC, EGOZ I LLC, EGOZ	:
II LLC, MASTERGEN, LLC,	:
ERYTHRINA, LLC, AP 2016 1, LLC,	:
AP 2014 3A, LLC, AP 2014 2, LLC,	:
AND WASO HOLDING	:
CORPORATION,	:
	:
Plaintiff,	:
	:
v.	:
	:
THE REPUBLIC OF ARGENTINA,	:
	:
Defendant.	:
-----X	

Case No.: 1:19-CV-10109 (LAP)

Case No.: 1:19-CV-10131 (LAP)

Case No.: 1:19-CV-11338 (LAP)

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APE GROUP SPA, ROMANO	:
CONSULTING SPA, ICARO SRL	:
and ELAZAR ROMANO,	:
	:
Plaintiffs,	:
	:
v.	:
	:
THE REPUBLIC OF ARGENTINA,	:
	:
Defendant.	:
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Case No.: 1:20-CV-10409 (LAP)

PLEASE TAKE NOTICE THAT upon: (i) Plaintiffs’ Memorandum of Law in Opposition to the Republic’s Motion for Summary Judgment and in Support of Plaintiffs’ Cross-Motion for Summary Judgment; (ii) the Declaration of Edward A. Friedman in Opposition to the Republic’s Motion for Summary Judgment and in Support of Plaintiffs’ Cross-Motion for Summary Judgment, dated June 13, 2023, and the exhibits attached thereto; (iii) Plaintiffs’ Local Civil Rule 56.1(b) Statement of Material Facts in Support of Plaintiffs’ Cross-Motion for Summary Judgment; and (iv) Plaintiffs’ Response to Defendants’ Rule 56.1 Statement of Material Facts as to Which There Is No Genuine Material Dispute; plaintiffs Aurelius Capital Master, Ltd.; Novoriver S.A.; ACP Master, Ltd.; 683 Capital Partners, LP; Adona LLC; Egoz I LLC; Egoz II LLC; Mastergen, LLC; Erythrina, LLC; AP 2016 1, LLC; AP 2014 3A, LLC; AP 2014 2, LLC; WASO Holding Corporation; Ape Group SpA; Romano Consulting SpA; Icaro SRL; and

Elazar Romano (“Plaintiffs”), will move this Court, before the Honorable Loretta A. Preska, United States District Judge, in Courtroom 12A, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, on a date and time designated by this Court, for an order granting summary judgment for Plaintiffs on all claims they assert against defendant the Republic of Argentina (the “Republic”) and dismissing the Republic’s affirmative defenses.

PLEASE TAKE FURTHER NOTICE THAT Plaintiffs request oral argument.

Dated: New York, New York
June 13, 2023

Respectfully submitted,

s/ Edward A. Friedman
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Daniel B. Rapport
Michael S. Palmieri

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Mastergen, LLC, Erythrina, LLC,
AP 2016 1, LLC, AP 2014 3A, LLC,
AP 2014 2, LLC, and
WASO Holding Corporation*

s/ Matthew M. Riccardi

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